Flowers Baking Company of Jacksonville, LLC
Commercial Bakery
Facility ID No.: 0310418
Duval County

Title V Air Operation Permit Renewal
DRAFT Title V Operation Permit No.: 0310418-005-AV
Renewal of Title V Air Operation Permit No.: 0310418-004-AV

PERMITTING AND COMPLIANCE AUTHORITY

NEIGHBORHOODS DEPARTMENT
ENVIRONMENTAL QUALITY DIVISION
ED BALL BUILDING, 214 NORTH HOGAN, 7TH FLOOR
JACKSONVILLE, FL 32202
TELEPHONE: (904) 255-7100
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Title V Air Operation Permit Renewal

DRAFT Title V Air Operation Permit No.: 0310214-005-AV
Renewal of Title V Air Operation Permit No.: 0310214-004-AV

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Emission Unit ID No.	Brief Description
001	Bread oven
002	Bun Oven

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Permittee:
Flowers Baking Company of Jacksonville, LLC
2260 West 30th Street
Jacksonville, FL 32209

DRAFT Permit No.: 0310418-005-AV
Facility ID No.: 0310418
SIC No.: 20
Project: Title V Air Operation Permit Renewal

This permit is for the purpose of renewing Title V Air Operation Permit No. 0310418-004-AV. Flowers Baking Company of Jacksonville, LLC is located at 2260 West 30th Street, Jacksonville Duval County, FL 32209.; UTM Coordinates: Zone 17, 433.290 km East and 3359.010 km North; Latitude: 30° 21' 46" North and Longitude: 81° 42' 04" West.

This Title V Air Operation Permit is issued under the provisions of Chapter 403, Florida Statutes (FS), and Chapters 62-4, 62-210 and 62-213, Florida Administrative Code (FAC). The above named permittee is hereby authorized to operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Permitting Authority, in accordance with the terms and conditions of this permit.

Referenced attachments made a part of this permit:

Statement of Basis
Appendix I-1, List of Insignificant Emissions Units and/or Activities
Appendix TV-6, Title V Conditions version dated 06/23/06

Effective Date:
Renewal Application Due Date:
Expiration Date:

Neighborhoods Department
Environmental Quality Division

_____
Vincent A. Seibold, P.E.,
Division Chief

VAS/HDS

Section I. Facility Information

Subsection A. Facility Description

Bread baking at this facility is a highly mechanized process. Bulk quantities of flour are shipped to the facility in cargo tankers and the flour is conveyed into one of the facility's two storage silos (insignificant emission units). These silos, which are located inside the facility, utilize bin vent filters to minimize the loss of flour during unloading. The flour is then weighed and mixed with sugar, yeast, water, and other miscellaneous ingredients.

There are three basic types of dough mixing processes utilized at the facility: straight dough, sponge dough and liquid fermentation. These processes vary in the manner in which the various dough ingredients are mixed, which determines the amount of fermentation time available. Fermentation time can vary from 20 minutes or less to five hours or more, usually averaging between three to three and a half hours. The baking process, which occurs in the two ovens (bread oven – emission Unit No. 001) and bun oven – Emission Unit No. 002), causes expansion of the loaf to final volume, crust formation, yeast and enzymatic activity inactivation, coagulation of the dough proteins, partial gelatinization of the starch, and reduction of loaf moisture, all of which are necessary to produce high-quality bread products.

Before entering the oven, the dough is allowed to rise in a "proof box". Steam for this high temperature, high-humidity proof box environment is supplied by two natural gas-fired boilers (insignificant emissions units). Oven emissions are generated by two processes: the combustion of natural gas and off-gassing from the bread themselves. Bread product off-gasses are generated as a result of the fermentation process, which causes the sugars and starches to be converted to ethanol, carbon dioxide, and water. Fermentation begins immediately following the initial mixing of ingredients and continues until the yeast is killed in the oven. During the initial fermentation period, a skin forms on the top of the dough. This keeps the ethanol and carbon dioxide in the dough, thereby allowing the dough to rise and minimizing fugitive emissions. As a result, most of the ethanol generated by the fermentation is released in the oven when the skin breaks during the baking process.

The baking of bread products usually requires 7 to 30 minutes. Once the product exits the oven, it is allowed to cool while it is transferred via conveyor to the slicing and packaging area. Once sliced and packaged, the product is shipped to customers by truck.

This permit is for the purpose of renewing Title V Air Operation Permit No. 0310418-004-AV.

Also included in this permit are miscellaneous insignificant emissions units and/or activities.

Flowers Baking Company of Jacksonville, LLC is a Title V major source of air pollution because the potential emissions of one or more individual criteria pollutants is equal to or greater than 100 tons per year in accordance with Chapter 62-210, FAC, and Rule 2.301, Jacksonville Environmental Protection Board (JEPB).

Based upon the Title V permit application renewal received June 8, 2012, this facility is not a major source of Hazardous Air Pollutants [HAP(s)].

This facility does not contain any emission units subject to Compliance Assurance Monitoring (CAM) requirements.

Subsection B. Summary of Emission Unit ID Nos. and Brief Descriptions

Emission Unit No.	**Brief Description**
001	Bread Oven
002	Bun Oven

Note: Please reference the Permit No., Facility ID No., and appropriate Emission Unit ID No(s). , on all correspondence, test report submittal, applications, etc.

Subsection C. Relevant Documents

The documents listed below are not a part of this permit, however, they are specifically related to this permitting action.

These documents are provided to the permittee for information purposes only:

Appendix A-1, Abbreviations, Acronyms, Citations, and Identification Numbers
Appendix H-1, Permit History
Appendix LR-1, Local Rule Index
Table 1-1, Summary of Air Pollutant Standards and Terms
Table 2-1, Summary of Compliance Requirements

These documents are on file with the Permitting Authority:

Title V Air Operation Permit Renewal Application received June 8, 2012
Title V Air Operation Permit No. 0310418-004-AV

Section II. Facility Wide Conditions

The following conditions apply facility-wide:

1. Appendix TV-6, Title V Conditions, is a part of this permit.
   {Permitting note: Appendix TV-6, Title V Conditions, is distributed to the permittee only. Other persons requesting copies of these conditions shall be provided one copy when requested or otherwise appropriate.}

2. General Particulate Emission Limiting Standards. General Visible Emissions Standard.
   Except for emissions units that are subject to a particulate matter or opacity limit set forth or established by rule and reflected by conditions in this permit, no person shall cause, let, permit, suffer or allow to be discharged into the atmosphere the emissions of air pollutants from any activity, the density of which is equal to or greater than that designated as Number 1 on the Ringelmann Chart (20 percent opacity) in accordance with Rule 62-296.320(4)(b)1., FAC, and Rule 2.1101, JEPB. EPA Method 9 is the method of compliance pursuant to Chapter 62-297, FAC, and Rule 2.1201, JEPB. Testing shall be required upon request of the Permitting Authority.

3. General Pollutant Emission Limiting Standards. Volatile Organic Compounds (VOC) Emissions or Organic Solvents (OS) Emissions. The permittee shall allow no person to store, pump, handle, process, load, unload, or use in any installation, VOC or OS without applying known and existing vapor emission control devices or systems deemed necessary and ordered by the Permitting Authority.
   [Rule 62-296.320(1), FAC, and Rule 2.1101, JEPB]

4. Excess emissions resulting from startup, shutdown, or malfunction of any emission unit (EU) shall be permitted providing (1) best operational practices to minimize emissions are adhered to and (2) the duration of excess emissions shall be minimized but in no case exceed two hours in any 24 hour period unless specifically authorized by the Permitting Authority for longer duration. Excess emissions which are caused entirely or in part by poor maintenance, poor operation, or any other equipment or process failure which may reasonably be prevented during startup, shutdown, or malfunction shall be prohibited. In the case of excess emissions resulting from malfunctions, each owner or operator shall notify the Permitting Authority in accordance with Rule 62-4.130, FAC and Rule 2.1401, JEPB. A full written report on the malfunctions shall be submitted to the Permitting Authority in a quarterly report, if requested by the Permitting Authority.
[Rule 62-210.700, FAC, and Rule 2.301, JEPB]

5. Reasonable precautions to prevent the emission of unconfined particulate matter shall include the following:

   a. Operation of filtration devices on each of the two silos in order to minimize flour loss as it is being pneumatically conveyed to the silos.
   b. Immediate removal and disposal of any flour that may be spilled onto the concrete outside the facility during the unloading process.

   [Rule 62-296.320(4)(c)1.and 2., FAC and Rule 2.1101, JEPB]

6. <u>Prevention of Accidental Releases (Section 112(r) of CAA)</u>.

   a. The permittee shall submit its Risk Management Plan (RMP) to the Chemical Emergency Preparedness and Prevention Office (CEPPO) RMP Reporting Center when, and if, such requirement becomes applicable. Any Risk Management Plans, original submittals, revisions or updates to submittals, should be sent to:

   RMP Reporting Center
   Post Office Box 10162
   Fairfax, VA 22038
   Telephone: (703) 227-7650

   and,

   b. The permittee shall submit to the Permitting Authority Title V certification forms or a compliance schedule in accordance with Rule 62-213.440(2), FAC.

   [40 CFR 68, Rule 204.800, FAC, and Rule 2.1001, JEPB]

7. <u>Annual Operation Report</u>. Permittee shall submit an annual operating report to the Permitting Authority for all emissions units on the forms supplied for each calendar year by April 1 of the following year.
[Rule 62-210.370(3), F.A.C. and Rule 2.301, JEPB]

8. <u>Permit Renewal</u>. For purposes of a permit renewal, a timely application is one that is submitted 225 days before the expiration of a permit that expires on or after June 1, 2009.
[Rule 62-213.420(1)(a)2., F.A.C. and Rule 2.501, JEPB]

9. Notification of Startup. The owners or operator of any emissions unit or facility which has a valid air operation permit which has been shut down more than one year, shall notify the Permitting Authority in writing of the intent to start up such emissions unit or facility, a minimum of 60 days prior to the intended startup date.

   a. The notification shall include information as to the startup date, anticipated emission rates or pollutants released, changes to processes or control devices which will result in changes to emission rates, and any other conditions which may differ from the valid outstanding operation permit.
   b. If, due to an emergency, a startup date is not known 60 days prior thereto, the owner shall notify the Permitting Authority as soon as possible after the date of such startup is ascertained.

   [Rule 62-210.300(5), F.A.C. and Rule 2.301, JEPB]

10. Insignificant Emission Units and/or Activities, Appendix I-1, List of Insignificant Emission Units and/or Activities, is a part of this permit.
    [Rule 62-213.440(1), FAC, Rule 62-213.430(6), FAC, Rule 62-4.040(1)(b), FAC; Rule 2.501, JEPB and Rule 2.1401, JEPB]

11. Annual Emissions Fee Form and Fee. The annual Title V emissions fees are due (postmarked) by March 1st of each year. The completed form and calculated fee shall be submitted to: Major Air Pollution Source Annual Emissions Fee, P.O. Box 3070, Tallahassee, Florida 32315-3070. The forms are available for download by accessing the Title V Annual Emissions Fee On-Line Information Center at the following Internet web site: "http://www.dep.state.fl.us/air/emission/tvfee.htm".
    [Rule 62-213.205, FAC and Rule 2.501, JEPB]

12. Certification by Responsible Official (RO). In addition to the professional engineering certification required for applications by Rule 62-4.050(3), F.A.C., any application form, report, compliance statement, compliance plan and compliance schedule submitted pursuant to Chapter 62-213, F.A.C., shall contain a certification signed by a responsible official that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Any responsible official who fails to submit any required information or who has submitted incorrect information shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary information or correct information.
    [Rule 62-213.420(4), FAC and Rule 2.501, JEPB]

13. Statement of Compliance. The annual statement of compliance pursuant to Rule 62-213.440(3)(a)2., FAC, shall be submitted to the Permitting Authority and EPA within 60 (sixty) days after the end of the calendar year using DEP Form No. 62-213.900(7), FAC. {Permitting Note: This condition implements the requirements of Rules 62-213.440(3)(a)2. & 3., FAC (see Condition 51. of Appendix TV-6, Title V Conditions)}
    [Rules 62-213.440(3) and 62-213.900, FAC, and Rule 2.501, JEPB]

14. When appropriate, any recording, monitoring or reporting requirements that are time-specific shall be in accordance with the effective date of the permit, which defines day one.
    [Rule 62-213.440, FAC and Rule 2.501, JEPB]

15. Any reports, data, notifications, certifications, and requests required to be sent to the United States Environmental Protection Agency should be sent to:

United States Environmental Protection Agency
Region 4
Air, Pesticides & Toxics Management Division
Air & EPCRA Enforcement Branch, Air Enforcement Section
61 Forsyth Street
Atlanta, GA 30303-8960
Telephone: (404) 562-9155
Fax: (404) 562-9163

16. The permittee shall submit reports of any required monitoring at least every six (6) months. All instances of deviations from permit requirements must be clearly identified in such reports. The permittee shall report in accordance with the requirements of Rule 62-210.700(6), FAC, Rule 62-4.130, FAC, Rule 2.301, JEPB, and Rule 2.1401, JEPB, deviations from permit requirements, including those attributable to upset conditions as defined in the permit. Reports shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All reports shall be accompanied by a certification by a responsible official, pursuant to Rule 62-213.420(4), FAC and Rule 2.501, JEPB. Unless otherwise specified in **a permit, rule, or order;** reports shall cover the period of January through June (report due on or before September 1) and July through December (report due on or before March 1).
[Rule 62-213.440(1)(b)3., FAC and Rule 2.501, JEPB]

17. The permittee shall submit all compliance related notifications and reports required of this permit to:

Neighborhoods Department
Environmental Quality Division
Ed Ball Building
214 North Hogan Street, 7th Floor
Jacksonville, FL 32202
Telephone: (904) 255-7100
Fax: (904) 588-0518

The following Facility-wide conditions are not federally enforceable

18. General Pollutant Emission Limiting Standards. Objectionable Odor Prohibited. The permittee shall not cause, suffer, allow, or permit the discharge of air pollutants which cause or contribute to an objectionable odor.
[Rule 62-296.320(2), FAC, and Rule 2.1101, JEPB]

19. The facility shall be subject to the City of Jacksonville Ordinance Code, Title X, Chapter 360 [Environmental Regulation], Chapter 362 [Air and Water Pollution], Chapter 376 [Odor Control], and JEPB Rule 1 [Final Rules with Respect to Organization, Procedure, and Practice].

20. The facility shall be subject to JEPB Rule 2, Parts I through VII, and Parts IX through XIV.

Section III. Emissions Unit(s) and Conditions

Emission Unit 001-Bread Oven

Emission Unit Description: Natural gas fired (Maximum rating of 4.98 X 10^6 Btu per hour) oven for the baking of bread

Essential Potential to Emit (PTE) Parameters

1. Estimated maximum bread production is 47,245 tons/yr (tons/yr).
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously, i.e., 8760 hours per year (hrs/yr).
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Record-keeping Requirements

3. The owner or operator shall maintain records of the tons of bread produced on a calendar month basis. Owners or operators shall maintain these records for a minimum period of five (5) years.
   [Rule 62-213.440(1)(b)2.b., FAC, and Rule 2.501, JEPB]

Emission Unit 002-Bun Oven

Emission Unit Description: Natural gas fired (Maximum rating of 3.84 X 10^6 Btu per hour) oven for the baking of bread buns.

Essential Potential to Emit (PTE) Parameters

1. Estimated maximum bun production is 21,680 tons/yr.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

2. This EU shall be allowed to operate continuously, i.e., 8760 hrs/yr.
   [Rule 62-210.200(PTE), FAC, and Rule 2.301, JEPB]

Record-keeping Requirements

3. The owner or operator shall maintain records of the tons of bread buns produced on a calendar month basis. Owners or operators shall maintain these records for a minimum period of five (5) years.
   [Rule 62-213.440(1)(b)2.b., FAC, and Rule 2.501, JEPB]